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Andre J.T. Douglas
309 Dryden Street
Thousand Oaks, CA 91360
(805)257-5300 office hours

February 18, 1997

Office of the Secretary
Federal Communications Commission
1919 M Street
N.W. Washington D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: COMMENT ON INDUSTRY PROPOSAL FOR RATING VIDEO PROGRAMMING
(CS Docket No 97-55)

Dear Members of the Commission,

The industry proposal DOES NOT meet the standards set forth in section 551 (e), and therefore the industry proposal should be deemed UNACCEPTABLE.

Section 551 (e) seeks to determine that distributors of video programming have established voluntary rules for rating video programming that contains sexual, violent, or other indecent material about which ***parents should be informed ***before it is displayed*** to children.

The industry proposal is fatally flawed because:

* Section 551 (e) expects that **parents should be informed** of sexual, violent, or other indecent material.

The industry proposal lacks any reference to sexual, violent or any other indecent material in its rating configuration TV-PG etc. This blunderous oversight of the guidelines provided in section 551 (e), leaves the parent totally uninformed.

** Section 551 (e) expects that parents should be informed ***before it is displayed.***

Subsequently by lacking explicit reference to sexual, violent or any other indecent material, in its rating configuration. The industry proposal has therefore, also failed to inform the parent before such content is displayed.

These guideline oversights have left the industry proposal inadequate as an informative video programming rating method.

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Factors to be considered in determining acceptability for any video program rating method:

- 1) There must be at least an abbreviated reference to the questionable subject matter being rated.
- 2) There must be an indication of the level or magnitude of occurrence, of the questionable subject matter being rated.
- 3) There must be an indication of zero or the like, assuring in fact, that questionable subject matter is truly insignificant or non-existent.
- 4) There must be a standard and clear "Red Flag" level at which parents may recognize repeating or significant occurrences for each questionable subject matter.
- 5) The rating method or format must be readily recognizable amongst other text, on an electronic display or product packaging.
- 6) The rating method or format must be uncomplicated, and remain in a standard configuration throughout its application in all media forms.

Factors to be considered in addition to the guidelines set forth in section 551 (e), which will significantly enhance the usefulness of a rating method or format:

EDUCATIONAL CONTENT SHOULD BE INCLUDED. With a thoughtful application grading programs on their learning experience to include an indication of any moral or social value or lesson, the following advantages become apparent:

- a) Parents and viewers may have a better grasp as to how much fact or fiction, they and their children are exposed to.
- b) Parents and viewers may have the ability to weigh the level of any questionable subject matter against its educational value. For example, a documentary about the holocaust may well be rated heavily for nudity and violence, but its extremely high moral and social lessons bring its questionable subject matter into perspective.

Note: Including an educational rating will serve to override any blindness the "V- Chip" may have if a parent were to say block out nudity because of their concerns about perverse or obscene depiction's of nudity. Yet that same parent may feel different if nudity were depicted in a clinical or documentary fashion.

In order to best demonstrate the short comings of the industry proposal, it would be prudent to compare it against a rating format that does meet the guidelines set forth.

I present the attached three (3) pages showing a format utilizing acronyms with corresponding numeric values, each having specific and readily understandable definitions.



AUDIO/VIDEO RATING CHART

©

This program rating system utilizes the acronym E.V.I.L.S in a chart-like layout.
 Each letter represents sensitive program subject matter.
 Each number coincides with a letter.
 The numbers represent the magnitude of that subject matter in the program being rated.
 The letters and numbers coincide with an existing motion picture rating.

Acronym

E DUCATION
V IOLENCE
I NDUSTRY RATING
L ANGUAGE
S EX

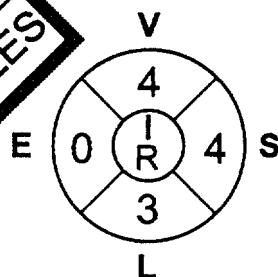
Numeric Definitions

Values for Educational Content

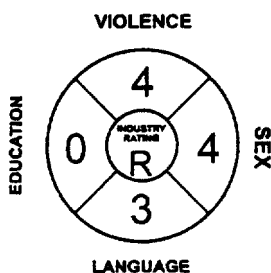
Values for Other Subject Content

Fictional with little or no positive moral value =	0	= Zero Content
Fictional with some positive moral or social value =	1	= Insignificant and Incidental
Fiction with a strong positive moral and/or social theme =	2	= Parental Guidance suggested due to a significant occurrence
Based on Fact with strong and positive social themes =	3	= Repeat and Significant occurrences
Completely factual or documentary in nature =	4	= Graphic and Explicit

EXAMPLES



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E	V	--	I	--	L	S
0	4	--	R	--	3	4

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AUDIO/VIDEO RATING CHART

©

This program rating system utilizes the acronym V.I.C.E.S. in a chart-like layout.

Each letter represents sensitive program subject matter.

Each number coincides with a letter.

The numbers represent the magnitude of that subject matter in the program being rated.

The letters and numbers coincide with an existing motion picture rating.

Acronym

V IOLENCE
I MPLIED OR EXPLICIT SEX / NUDITY
C RUDE LANGUAGE
E DUCATION
S TANDARD RATING

Numeric Definitions

Values for Educational Content		Values for Other Subject Content
Fictional with little or no positive moral value =	0	= Zero Content
Fictional with some positive moral or social value =	1	= Insignificant and Incidental
Fiction with a strong positive moral and/or social theme =	2	= Parental Guidance suggested due to a significant occurrence
Based on Fact with strong and positive social themes =	3	= Repeat and Significant occurrences
Completely factual or documentary in nature =	4	= Graphic and Explicit

EXAMPLES

V

E

COPYRIGHT © A.J.T.DOUGLAS 1997

I

EDUCATION

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C

LANGUAGE

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AUDIO/VIDEO RATING CHART

©

This program rating system utilizes the acronym V.A.L.U.E. in a chart-like layout.

Each letter represents sensitive program subject matter.

Each number coincides with a letter.

The numbers represent the magnitude of that subject matter in the program being rated.

The letters and numbers coincide with an existing motion picture rating.

Acronym

V IOLENCE
A CTS OR IMPLIED SEX / NUDITY
L ANGUAGE
U MBRELLA RATING
E DUCATION

Numeric Definitions

Values for Educational Content

Fictional with little or no positive moral value =

Fictional with some positive moral or social value =

Fiction with a strong positive moral and/or social theme =

Based on Fact with strong and positive social themes =

Completely factual or documentary in nature =

0
1
2
3
4

Values for Other Subject Content

= Zero Content

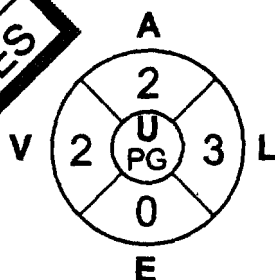
= Insignificant and Incidental

= Parental Guidance suggested due to a significant occurrence

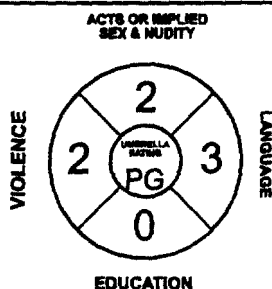
= Repeat and Significant occurrences

= Graphic and Explicit

EXAMPLES



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V A L - U - E
2 2 3 - PG - 0

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2 2 3 -PG- 0

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